CERTAIN & ZILBERG, PLLC 488 MADISON AVENUE, 20TH FLOOR NEW YORK, NEW YORK 10022 TEL. 212.687.7800 FAX 212.687.7801

Writer's Extension: x225 Writer's Email: gcertain@certainlaw.com

February 25, 2022

VIA FIRST CLASS MAIL

The Honorable Chief Judge Roslynn R. Mauskopf United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: Doe v. Holy Bagel Café II, Inc. et al

Docket No. 2:15-cv-03620-RRM-AYS

Dear Chief Judge Mauskopf:

Our office represents the Plaintiff Jane Doe in the above-referenced matter. I write in response to the letter filed yesterday, (February 25, 2022, ECF Document #s 66 and 67), by bankruptcy counsel to Defendant Ludwin Sanchez a/k/a Roberto Sanchez.

It is Plaintiff's position that the factual determination made during the trial of the District Court action, given the intentional nature of the claims made against Defendant Sanchez, are likely to be dispositive with respect to the issue of dischargeability under 11 U.S.C. Section 523(a)(6). However, it remains our understanding that such a determination will be made by the U.S. Bankruptcy Court upon resolution of the District Court action. Therefore, it is our understanding that the issues raised by Defendant Sanchez's bankruptcy counsel in yesterday's letter to this court does not call for any action or ruling.

Respectfully submitted,

CERTAIN & ZILBERG, PLLC

By Gary Certain

cc:

Ronald D. Weiss, P.C. Bankruptcy Counsel to Defendant Sanchez weiss@fresh-start.com

via ECF:

Andrew David Grossman, Esq.

Counsel to Defendants Holy Bagel Café II, Inc.

and En Seoun Lee

Richard W. Young, Esq. Counsel to Defendant Sanchez